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Attorneys for Defendants  
CATLIN SPECIALTY INSURANCE COMPANY,  
GREENWICH INSURANCE COMPANY,  
and XL INSURANCE AMERICA, INC.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

EMPLOYERS MUTUAL CASUALTY  
COMPANY, an IOWA CORPORATION,

Plaintiff,

vs.

ZURICH AMERICAN INSURANCE  
COMPANY, an ILLINOIS CORPORATION;  
CATLIN SPECIALTY INSURANCE  
COMPANY, a DELAWARE  
CORPORATION; GREENWICH  
INSURANCE COMPANY, a DELAWARE  
CORPORATION, XL INSURANCE  
AMERICA, INC., a DELAWARE  
CORPORATION and DOES 1 through 250,  
inclusive,

Defendants.

CASE NO.: 2:18-cv-00089-JCM\_PAL

JOINT MOTION FOR EXTENSION OF  
TIME FOR DEFENDANTS  
CATLIN SPECIALTY INSURANCE  
COMPANY, GREENWICH INSURANCE  
COMPANY, AND XL INSURANCE  
AMERICA, INC., TO FILE RESPONSE TO  
COMPLAINT

(FIRST REQUEST)

1 Defendants CATLIN SPECIALTY INSURANCE COMPANY, GREENWICH  
2 INSURANCE COMPANY, and XL INSURANCE AMERICA, INC., (collectively “Defendants”)  
3 by and through their attorneys, Duane Morris LLP, and Plaintiff EMPLOYERS MUTUAL  
4 CASUALTY COMPANY (“Plaintiff”), by and through its attorneys, The Grad Law Firm, hereby  
5 jointly request that this Court grant this joint motion, in compliance with LR IA 6-1 and LR 7-1,  
6 and provide Defendants a 30-day extension of time, until February 22, 2018, to file a responsive  
7 pleading to the Complaint.

8 In support of this joint motion the Parties state:

- 9 1. On or about January 16, 2018, prior to Defendants responding to Plaintiff’s complaint, a  
10 Notice of Removal was filed by defendant Zurich American Insurance Company, which  
11 Defendants joined, and this action was removed from the Clark County District Court, case  
12 no. A-17-76603-C, to this Court;
- 13 2. Pursuant to Fed. R. Civ. P. 81(c)(2)(c), a defendant who did not respond to the complaint  
14 before removal has seven (7) days to file a responsive pleading from when a Notice of  
15 Removal was filed, making a response due January 23, 2018;
- 16 3. Counsel for Defendants were recently retained by Defendants and need additional time to  
17 evaluate this matter before preparing a responsive pleading;
- 18 4. The Parties have consented to a 30-day extension; and
- 19 5. No party will be prejudiced by permitting Defendants to have an extension of time to file a  
20 responsive pleading to the Complaint.

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1 WHEREFORE, the Parties respectfully request that the Court grant a 30-day extension of  
2 time, until **February 22, 2018**, to allow Defendants to file a responsive pleading to the Complaint.

3  
4 THE GRAD LAW FIRM

DUANE MORRIS LLP

5 By /s/ Laleaque Grad  
6 Laleaque Grad, Bar No. 8475

By /s/ Tyson E. Hafen  
Tyson E. Hafen, Bar No. 13139

7 Attorneys for Plaintiff  
8 EMPLOYERS MUTUAL CASUALTY  
9 COMPANY

Attorneys for Defendants  
CATLIN SPECIALTY INSURANCE  
COMPANY, GREENWICH INSURANCE  
COMPANY, and XL INSURANCE  
AMERICA, INC.

10  
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12 IT IS SO ORDERED.

13 DATED: February 5, 2018

14   
15 U.S. MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on January 22, 2018, I served via CM/ECF and/or deposited for mailing in the U.S. Mail a true and correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANTS CATLIN SPECIALTY INSURANCE COMPANY, GREENWICH INSURANCE COMPANY, AND XL INSURANCE AMERICA, INC., TO FILE RESPONSE TO COMPLAINT**, (postage prepaid if by U.S. Mail) and addressed to all parties and counsel as identified on the CM/ECF-generated Notice of Electronic Filing.

/s/ Jana Dailey

Jana Dailey

An employee of DUANE MORRIS LLP